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October 14, 2011

Mr. Gary Miller
U.S. Environmental Protection Agency
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: San Jacinto Waste Pits Superfund Site Field Studies Issues
Project Number: 090557-01

Dear Gary:

The ongoing Current Velocity and Upstream Sediment Load Studies continue to be adversely affected by drought conditions in the Houston area. The acoustic Doppler current profiler (ADCP) deployment is ongoing, with the objective being to collect current velocity data during two high-flow events. The extremely low water levels in Lake Houston, when combined with severe drought conditions, make it highly unlikely that one or more high-flow events will occur within the next two months. The schedule for the modeling study would be severely impacted (i.e., delayed beyond the present deadline of February 2012 for submission of the modeling report to USEPA) if we wait for a high-flow event(s) to occur. In addition, ADCP data collected during 2010 and 2011 (under lower flow conditions) have been used to calibrate the hydrodynamic model. Thus, we request that the current velocity study be discontinued and the ADCP recovered from the present deployment location. If it is determined during USEPA's review of the modeling study report that additional current velocity data needs to be collected to reduce the uncertainty in model predictions, then a future ADCP deployment may be considered.

Similarly, we request that the upstream sediment load study by permanently suspended due to the drought conditions. As discussed during the first Modeling Workshop during

September 2011, techniques have been developed, using site-specific data, to estimate the upstream sediment load with a reasonable level of certainty. Historical flow rate and total suspended solids (TSS) concentration data are available at five USGS gauging stations on streams that flow into Lake Houston. These data were analyzed and used to develop a sediment rating curve (i.e., TSS concentration versus flow rate) for estimating the upstream sediment load in the San Jacinto River. This methodology is adequate for development and calibration of the sediment transport model. Thus, obtaining sediment load data during two high-flow events (even if they were to occur in the near future, which is highly unlikely) would not significantly reduce uncertainty in the present estimates of the upstream sediment load.

Sincerely,

David C. Keith

David C. Keith
Project Coordinator

Cc: Andrew Shafer
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